

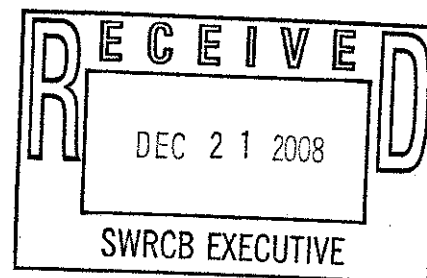
Public Comment  
Recycled Water Policy  
Deadline: 12/22/08 by 12 noon

**From:** JAckerman <j439m@silcom.com>  
**To:** <Commentletters@waterboards.ca.gov>  
**Date:** Sunday, December 21, 2008 2:45 PM  
**Subject:** Comments On Proposed Recycled Water Policy And Attendant DraftStaff Report On Environmental Impacts

To: Water Resources Control Board, State of California  
From: John M. Ackerman, M.D.

I have looked through the Draft Staff Report (DSR) as well as the comments submitted by Dr. Edo Mc Gowan, Ph.D. which are addressed to the referenced topic. I am struck by the lack of coverage given by the DSR to a series of potential Public Health and environmental issues that appear to be dismissed by the DSR as insignificant, instead of correctly stating that the issues might, potentially, have major adverse impacts. There is the real possibility that, based upon the DSR, that the citizens of this State are likely to be deprived of critical information and, therefore, not have a chance to fully participate in the creation of this policy.

The goal of CEQA is to assure a fully informed public which would then be aware of the effects of the proposed project or policy. Public involvement in the CEQA process aims to ensure that the public has a voice in the decision-making process. Specifically, the public has concerns about environmental issues that would have potential adverse effects on the physical environment so that they get properly addressed prior to project approval. From my review of the Staff Report as well as Dr. Mc Gowan's comments, it seems at this point that there is a large difference between reality and what is in the report. Therefore, your report requires a robust EIR.



In addition, the DSR would have you believe that issues related to contaminants of environmental consequence (CEC's) can wait for more analyses. The U.S. EPA has just come out with an announcement that cocktails of CEC's as compared to the study of a single material is where the emphasis must be. As currently designed, sewer plants are not able to stop these materials from reaching the environment. However, knowing that and then deliberately setting up a system that will delivery these CEC's into communities where families live is vastly different from both a scientific and moral perspective. The CEC's seem to build up in sediments and that may be taking place within communities such as in backyard gardens. Take, for example, the following: The group known as polybrominated diphenyl ethers (PBDE's) (1), which are found in flame-retardants (2), as a <sup>3</sup>potent neurodevelopmental toxin<sup>2</sup> in humans according to Alexander Suvorov and Larissa Takser at the Département Obstétrique Gynécologie, Faculté de Médecine fet des Sciences de la Santé Université de Sherbrooke, Quebec.

Dr. Mc Gowan's comments support a fair argument that the proposed project may have a significant negative effect on the environment.

(1) <sup>3</sup>Polybrominated Diphenyl Ethers in an Advanced Wastewater Treatment Plant, Part 2: Potential Effects on a Unique Aquatic System<sup>2</sup>, Journal of Environmental Engineering and Science, Vol. 4, No. 5, 1 September, 2005, pp. 369-383 (15).

(2) <sup>3</sup>Flame Retardants - Robbing Peter to Poison Paul<sup>2</sup>, SludgeWatch-l@list.web.net, Kevin Ferguson, 18 December, 2008.